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OHAYON, JOSEPH DANIEL RUFFIN,  
ANASTAS EDDIE ARUTYUNYAN, and  
ALL STATE REMODELING, INC.

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

JORGE ALEJANDRO ROJAS,

Plaintiff,

v.

RONEN OHAYON, JOSEPH DANIEL  
RUFFIN, ANASTAS EDDIE  
ARUTYUNYAN, and ALL STATE  
REMODELING, INC.,

Defendants.

CASE NO. 2:22-cv-04100-FLA-PVC

DEFENDANTS' ANSWER TO  
COMPLAINT FOR DAMAGES;  
DEMAND FOR JURY TRIAL

Action Filed: August 23, 2022

Defendants, RONEN OHAYON, JOSEPH DANIEL RUFFIN, ANASTAS EDDIE  
ARUTYUNYAN, and ALL STATE REMODELING, INC., ("Defendants"), by and  
through the undersigned counsel, hereby answers Plaintiff JORGE ALEJANDRO  
ROJAS's ("Plaintiff") unverified Complaint and, admit, deny, and allege as follows:

1. Defendants lack specific information and belief to admit or deny the allegations  
contained in paragraph 1 of the Complaint and based on that lack of information or  
belief, deny those allegations.

ANSWER

14-CV-05841-JFW-AGR

1 2. Paragraph 2 does not allege any specific facts, thus defendants are unable to admit  
2 or deny.

3 3. Paragraph 3 does not allege any specific facts, thus defendants are unable to admit  
4 or deny.  
5

6 4. Defendants deny generally and specifically, each and every allegation contained  
7 in paragraph 4.  
8

9 5. As to paragraph 5 of the Complaint, Defendants admit the following: Defendant  
10 admits that this Court has original jurisdiction over certain claims which allege a  
11 violation of TCPA. These answering defendants lack sufficient information and  
12 belief to admit or deny all other allegations contained therein and based on that lack  
13 of information and belief deny the remainder of the paragraph.  
14

15 6. As to paragraph 6 of the Complaint, Defendants admit the following: All State  
16 Remodeling, Inc. conducts business in the State of California and is a California  
17 entity. The events that Plaintiff alleges are alleged to have taken place within the  
18 jurisdiction of the United States District Court, Central District of California and  
19 that Plaintiff attempts to invoke this Court's jurisdiction. These answering  
20 defendants lack sufficient information and belief to admit or deny all other  
21 allegations contained therein and based on that lack of information and belief deny  
22 the remainder of the paragraph.  
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1 7. Defendants lack specific information and belief to admit or deny the allegations  
2 contained in paragraph 7 of the Complaint and based on that lack of information or  
3 belief, deny those allegations.

4  
5 8. Defendants lack specific information and belief to admit or deny the allegations  
6 contained in paragraph 8 of the Complaint and based on that lack of information or  
7 belief, deny those allegations.

8  
9 9. Defendants admit the allegation in paragraph 9 of the Complaint.

10 10. Defendants admit the allegation in paragraph 10 of the Complaint.

11 11. Defendants admit the allegation in paragraph 11 of the Complaint.

12 12. Defendants admit the allegation in paragraph 12 of the Complaint.

13 13. Defendants admit the allegation in paragraph 13 of the Complaint.

14  
15 14. Defendants lack specific information and belief to admit or deny the allegations  
16 contained in paragraph 14 of the Complaint and based on that lack of information or  
17 belief, deny those allegations.

18  
19 15. As to paragraph 15 of the Complaint, Defendants admit the following: The  
20 statutory quote appears to be derived from statute. The remainder of the paragraph is  
21 a legal conclusion, and does not allege any specific facts, thus defendants are unable  
22 to admit or deny.

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24  
25 16. As to paragraph 16 of the Complaint, Defendants admit the following: The  
26 selective quote appears to be derived from statute. The remainder of the paragraph is  
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28

1 a legal conclusion, and does not allege any specific facts, thus defendants are unable  
2 to admit or deny.

3 17. The entirety of Paragraph 17 is a legal conclusion, and does not allege any  
4 specific facts, thus defendants are unable to admit or deny.

5  
6 18. As to paragraph 18 of the Complaint, Defendants admit the following: The  
7 TCPA provides a private cause of action under certain circumstances. The  
8 remainder of the paragraph is a legal conclusion, and does not allege any specific  
9 facts, thus defendants are unable to admit or deny.

10  
11 19. As to paragraph 19 of the Complaint, Defendants admit the following: The quote  
12 appears to be derived from a publication. The remainder of the paragraph is a legal  
13 conclusion, and does not allege any specific facts, thus defendants are unable to  
14 admit or deny.

15  
16  
17 20. As to paragraph 20 of the Complaint, Defendants admit the following: The quote  
18 appears to be derived from a publication. The remainder of the paragraph is a legal  
19 conclusion, and does not allege any specific facts, thus defendants are unable to  
20 admit or deny.

21  
22 21. As to paragraph 21 of the Complaint, Defendants admit the following: The  
23 selective quote appears to be derived from statute. The remainder of the paragraph is  
24 a legal conclusion, and does not allege any specific facts, thus defendants are unable  
25 to admit or deny.

1 22. As to paragraph 22 of the Complaint, Defendants admit the following: The  
2 selective quote appears to be derived from statute. The remainder of the paragraph is  
3 a legal conclusion, and does not allege any specific facts, thus defendants are unable  
4 to admit or deny.  
5

6 23. The entirety of Paragraph 23 is a legal conclusion, and does not allege any  
7 specific facts, thus defendants are unable to admit or deny.  
8

9 24. As to paragraph 24 of the Complaint, Defendants admit the following: The  
10 selective quote appears to be derived from statute. The remainder of the paragraph is  
11 a legal conclusion, and does not allege any specific facts, thus defendants are unable  
12 to admit or deny.  
13

14 25. The entirety of Paragraph 25 is a legal conclusion, and does not allege any  
15 specific facts, thus defendants are unable to admit or deny.  
16

17 26. The entirety of Paragraph 26 is a legal conclusion, and does not allege any  
18 specific facts, thus defendants are unable to admit or deny.  
19

20 27. As to paragraph 27 of the Complaint, Defendants admit the following: The  
21 selective quote appears to be derived from statute. The remainder of the paragraph is  
22 a legal conclusion, and does not allege any specific facts, thus defendants are unable  
23 to admit or deny.  
24

25 28. As to paragraph 28 of the Complaint, Defendants admit the following: The  
26 selective quote appears to be derived from a court decision. The remainder of the  
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1 paragraph is a legal conclusion, and does not allege any specific facts, thus  
2 defendants are unable to admit or deny.

3 29. Answering paragraph 29 of Plaintiff's Complaint, Defendants deny generally  
4 and specifically, each and every allegation contained in paragraphs 29.  
5

6 30. The entirety of Paragraph 30 is a legal conclusion, and does not allege any  
7 specific facts, thus defendants are unable to admit or deny.  
8

9 31. Answering paragraph 31 of Plaintiff's Complaint, Defendants deny generally  
10 and specifically, each and every allegation contained in paragraphs 31.

11 32. The entirety of Paragraph 32 is a legal conclusion, and does not allege any  
12 specific facts, thus defendants are unable to admit or deny.  
13

14 33. Defendants lack specific information and belief to admit or deny the allegations  
15 contained in paragraph 33 of the Complaint and based on that lack of information or  
16 belief, deny those allegations.  
17

18 34. Defendants lack specific information and belief to admit or deny the allegations  
19 contained in paragraph 34 of the Complaint and based on that lack of information or  
20 belief, deny those allegations.  
21

22 35. Defendants lack specific information and belief to admit or deny the allegations  
23 contained in paragraph 35 of the Complaint and based on that lack of information or  
24 belief, deny those allegations.  
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1 36. Defendants lack specific information and belief to admit or deny the allegations  
2 contained in paragraph 36 of the Complaint and based on that lack of information or  
3 belief, deny those allegations.  
4

5 37. As to paragraph 37 of the Complaint, Defendants admit the following:

6 Defendant All State Remodeling, Inc. is a construction/home remodeling company.

7 The remaining allegations in Paragraph 37 are denied.  
8

9 38. Paragraph 38 is vague, ambiguous and unintelligible as written. Thus,  
10 defendants lack specific information and belief to admit or deny the allegations  
11 contained in paragraph 38 of the Complaint and based on that lack of information or  
12 belief, deny those allegations.  
13

14 39. Paragraph 39 is vague and ambiguous as written. Thus, defendants lack specific  
15 information and belief to admit or deny the allegations contained in paragraph 39 of  
16 the Complaint and based on that lack of information or belief, deny those  
17 allegations.  
18

19 40. Defendants lack specific information and belief to admit or deny the allegations  
20 contained in paragraph 40 of the Complaint and based on that lack of information or  
21 belief, deny those allegations.  
22

23 41. Paragraph 41 is vague and ambiguous as written. Thus, defendants lack specific  
24 information and belief to admit or deny the allegations contained in paragraph 41 of  
25 the Complaint and based on that lack of information or belief, deny those  
26 allegations.  
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1 42. Defendants lack specific information and belief to admit or deny the allegations  
2 contained in paragraph 42 of the Complaint and based on that lack of information or  
3 belief, deny those allegations.

4  
5 43. Defendants lack specific information and belief to admit or deny the allegations  
6 contained in paragraph 43 of the Complaint and based on that lack of information or  
7 belief, deny those allegations.

8  
9 44. Defendants lack specific information and belief to admit or deny the allegations  
10 contained in paragraph 44 of the Complaint and based on that lack of information or  
11 belief, deny those allegations.

12  
13 45. Defendants lack specific information and belief to admit or deny the allegations  
14 contained in paragraph 45 of the Complaint and based on that lack of information or  
15 belief, deny those allegations.

16  
17 46. Defendants lack specific information and belief to admit or deny the allegations  
18 contained in paragraph 46 of the Complaint and based on that lack of information or  
19 belief, deny those allegations.

20  
21 47. Defendants lack specific information and belief to admit or deny the allegations  
22 contained in paragraph 47 of the Complaint and based on that lack of information or  
23 belief, deny those allegations.

24  
25 48. Paragraph 48 is vague and ambiguous as written. Thus, defendants lack specific  
26 information and belief to admit or deny the allegations contained in paragraph 48 of  
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1 the Complaint and based on that lack of information or belief, deny those  
2 allegations.

3 49. Paragraph 49 is vague and ambiguous as written. Thus, defendants lack specific  
4 information and belief to admit or deny the allegations contained in paragraph 49 of  
5 the Complaint and based on that lack of information or belief, deny those  
6 allegations.  
7

8 50. Paragraph 50 is vague and ambiguous as written. Thus, defendants lack specific  
9 information and belief to admit or deny the allegations contained in paragraph 50 of  
10 the Complaint and based on that lack of information or belief, deny those  
11 allegations.  
12

13 51. Paragraph 51 is vague and ambiguous as written. Thus, defendants lack specific  
14 information and belief to admit or deny the allegations contained in paragraph 51 of  
15 the Complaint and based on that lack of information or belief, deny those  
16 allegations.  
17

18 52. Paragraph 52 is vague and ambiguous as written. Thus, defendants lack specific  
19 information and belief to admit or deny the allegations contained in paragraph 52 of  
20 the Complaint and based on that lack of information or belief, deny those  
21 allegations.  
22

23 53. Paragraph 53 is vague and ambiguous as written. Thus, defendants lack specific  
24 information and belief to admit or deny the allegations contained in paragraph 53 of  
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1 the Complaint and based on that lack of information or belief, deny those  
2 allegations.

3 54. Defendants lack specific information and belief to admit or deny the allegations  
4 contained in paragraph 54 of the Complaint and based on that lack of information or  
5 belief, deny those allegations.

6  
7 55. Paragraph 55 is vague and ambiguous as written. Thus, defendants lack specific  
8 information and belief to admit or deny the allegations contained in paragraph 55 of  
9 the Complaint and based on that lack of information or belief, deny those  
10 allegations.

11  
12 56. Defendants lack specific information and belief to admit or deny the allegations  
13 contained in paragraph 56 of the Complaint and based on that lack of information or  
14 belief, deny those allegations.

15  
16 57. Defendants lack specific information and belief to admit or deny the allegations  
17 contained in paragraph 57 of the Complaint and based on that lack of information or  
18 belief, deny those allegations.

19  
20 58. Defendants lack specific information and belief to admit or deny the allegations  
21 contained in paragraph 58 of the Complaint and based on that lack of information or  
22 belief, deny those allegations.

23  
24 59. Answering paragraph 59 of Plaintiff's Complaint, Defendants deny generally  
25 and specifically, each and every allegation contained in paragraphs 59.

1 60. Paragraph 60 is vague and ambiguous as written. Thus, defendants lack specific  
2 information and belief to admit or deny the allegations contained in paragraph 60 of  
3 the Complaint and based on that lack of information or belief, deny those  
4 allegations.  
5

6 61. Paragraph 61 is vague and ambiguous as written. Thus, defendants lack specific  
7 information and belief to admit or deny the allegations contained in paragraph 61 of  
8 the Complaint and based on that lack of information or belief, deny those  
9 allegations.  
10

11 62. Paragraph 62 is vague and ambiguous as written. Thus, defendants lack specific  
12 information and belief to admit or deny the allegations contained in paragraph 62 of  
13 the Complaint and based on that lack of information or belief, deny those  
14 allegations.  
15

16 63. As to paragraph 63 of the Complaint, Defendants admit the following: The  
17 selective quote appears to be derived from a court decision. The remainder of the  
18 paragraph is a legal conclusion, and does not allege any specific facts, thus  
19 defendants are unable to admit or deny.  
20

21 64. Paragraph 64 is vague and ambiguous as written. Thus, defendants lack specific  
22 information and belief to admit or deny the allegations contained in paragraph 64 of  
23 the Complaint and based on that lack of information or belief, deny those  
24 allegations.  
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1 65. Answering paragraph 65 of Plaintiff's Complaint, Defendants deny generally  
2 and specifically, each and every allegation contained in paragraphs 65.

3 66. Answering paragraph 66 of Plaintiff's Complaint, Defendants deny generally  
4 and specifically, each and every allegation contained in paragraphs 66.

5 67. Answering paragraph 67 of Plaintiff's Complaint, Defendants deny generally  
6 and specifically, each and every allegation contained in paragraphs 67.

7 68. Answering paragraph 68 of Plaintiff's Complaint, Defendants deny generally  
8 and specifically, each and every allegation contained in paragraphs 68.

9 69. Answering paragraph 69 of Plaintiff's Complaint, Defendants deny generally  
10 and specifically, each and every allegation contained in paragraphs 69.

11 70. Answering paragraph 70 of Plaintiff's Complaint, Defendants deny generally  
12 and specifically, each and every allegation contained in paragraphs 70.

13 71. Defendants admit the allegation in paragraph 71 of the Complaint.

14 72. Answering paragraph 72 of Plaintiff's Complaint, Defendants deny generally  
15 and specifically, each and every allegation contained in paragraphs 72.

16 73. Answering paragraph 73 of Plaintiff's Complaint, Defendants deny generally  
17 and specifically, each and every allegation contained in paragraphs 73.

18 74. Answering paragraph 74 of Plaintiff's Complaint, Defendants deny generally  
19 and specifically, each and every allegation contained in paragraphs 74.

20 75. As to paragraph 75 of the Complaint, Defendants admit the following: The  
21 selective quote appears to be derived from a court decision. The remainder of the  
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1 paragraph is a legal conclusion, and does not allege any specific facts, thus  
2 defendants are unable to admit or deny.

3 76. Answering paragraph 76 of Plaintiff's Complaint, Defendants deny generally  
4 and specifically, each and every allegation contained in paragraphs 76.  
5

6 77. Answering paragraph 77 of Plaintiff's Complaint, Defendants deny generally  
7 and specifically, each and every allegation contained in paragraphs 77.  
8

9 78. Answering paragraph 78 of Plaintiff's Complaint, Defendants deny generally  
10 and specifically, each and every allegation contained in paragraphs 78.

11 79. At this stage of the proceedings, Defendants lack specific information and belief  
12 to admit or deny the allegations contained in paragraph 79 of the Complaint and  
13 based on that lack of information or belief, deny those allegations.  
14

15 80. Answering paragraph 80 of Plaintiff's Complaint, Defendants deny generally  
16 and specifically, each and every allegation contained in paragraphs 81.  
17

18 81. Answering paragraph 81 of Plaintiff's Complaint, Defendants deny generally  
19 and specifically, each and every allegation contained in paragraphs 81.  
20

21 82. Answering paragraph 82 of Plaintiff's Complaint, Defendants deny generally  
22 and specifically, each and every allegation contained in paragraphs 82.  
23

24 83. Answering paragraph 83 of Plaintiff's Complaint, Defendants deny generally  
25 and specifically, each and every allegation contained in paragraphs 83.

26 84. Answering paragraph 84 of Plaintiff's Complaint, Defendants deny generally  
27 and specifically, each and every allegation contained in paragraphs 84.  
28

1 85. Answering paragraph 85 of Plaintiff's Complaint, Defendants deny generally  
2 and specifically, each and every allegation contained in paragraphs 85.

3 86. Answering paragraph 86 of Plaintiff's Complaint, Defendants deny generally  
4 and specifically, each and every allegation contained in paragraphs 86.

5 87. Answering paragraph 87 of Plaintiff's Complaint, Defendants deny generally  
6 and specifically, each and every allegation contained in paragraphs 87.

7 88. Defendants lack specific information and belief to admit or deny the allegations  
8 contained in paragraph 88 of the Complaint and based on that lack of information or  
9 belief, deny those allegations.  
10

11 89. Answering paragraph 89 of Plaintiff's Complaint, Defendants deny generally  
12 and specifically, each and every allegation contained in paragraphs 89.

13 90. Answering paragraph 90 of Plaintiff's Complaint, Defendants deny generally  
14 and specifically, each and every allegation contained in paragraphs 90.

15 91. Answering paragraph 91 of Plaintiff's Complaint, Defendants deny generally  
16 and specifically, each and every allegation contained in paragraphs 91.

17 92. The entirety of Paragraph 92 is a legal conclusion, and does not allege any  
18 specific facts, thus defendants are unable to admit or deny.

19 93. Answering paragraph 93 of Plaintiff's Complaint, Defendants deny generally  
20 and specifically, each and every allegation contained in paragraphs 93.

21 94. Answering paragraph 94 of Plaintiff's Complaint, Defendants deny generally  
22 and specifically, each and every allegation contained in paragraphs 94.

1 95. Answering paragraph 95 of Plaintiff's Complaint, Defendants deny generally  
2 and specifically, each and every allegation contained in paragraphs 95.

3 96. Answering paragraph 96 of Plaintiff's Complaint, Defendants deny generally  
4 and specifically, each and every allegation contained in paragraphs 96.

5  
6 97. Paragraph 97 is vague and ambiguous as written. Thus, defendants lack specific  
7 information and belief to admit or deny the allegations contained in paragraph 97 of  
8 the Complaint and based on that lack of information or belief, deny those  
9 allegations.

10  
11 98. Paragraph 98 is vague and ambiguous as written. Thus, defendants lack specific  
12 information and belief to admit or deny the allegations contained in paragraph 98 of  
13 the Complaint and based on that lack of information or belief, deny those  
14 allegations.

15  
16  
17 99. Paragraph 99 is vague and ambiguous as written. Thus, defendants lack specific  
18 information and belief to admit or deny the allegations contained in paragraph 99 of  
19 the Complaint and based on that lack of information or belief, deny those  
20 allegations.

21  
22 100. Answering paragraph 100 of Plaintiff's Complaint, Defendants deny generally  
23 and specifically, each and every allegation contained in paragraphs 100.

24  
25 101. Answering paragraph 101 of Plaintiff's Complaint, Defendants deny generally  
26 and specifically, each and every allegation contained in paragraphs 101.

1 102. Answering paragraph 102 of Plaintiff's Complaint, Defendants deny generally  
2 and specifically, each and every allegation contained in paragraphs 102.

3 103. Paragraph 103 does not allege any specific facts, thus defendants are unable to  
4 admit or deny.  
5

6 104. Paragraph 104 does not allege any specific facts, thus defendants are unable to  
7 admit or deny.  
8

9 105. Answering paragraph 105 of Plaintiff's Complaint, Defendants deny generally  
10 and specifically, each and every allegation contained in paragraphs 105.

11 106. Answering paragraph 106 of Plaintiff's Complaint, Defendants deny generally  
12 and specifically, each and every allegation contained in paragraphs 106.  
13

14 107. Answering paragraph 107 of Plaintiff's Complaint, Defendants deny generally  
15 and specifically, each and every allegation contained in paragraphs 107.  
16

17 108. Paragraph 108 does not allege any specific facts, thus defendants are unable to  
18 admit or deny.

19 109. The entirety of Paragraph 109 is a legal conclusion, and does not allege any  
20 specific facts, thus defendants are unable to admit or deny.  
21

22 110. The entirety of Paragraph 110 is a legal conclusion, and does not allege any  
23 specific facts, thus defendants are unable to admit or deny.  
24

25 111. The entirety of Paragraph 111 is a legal conclusion, and does not allege any  
26 specific facts, thus defendants are unable to admit or deny.  
27  
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1 112. Answering paragraph 112 of Plaintiff's Complaint, Defendants deny generally  
2 and specifically, each and every allegation contained in paragraphs 112.

3 113. Answering paragraph 113 of Plaintiff's Complaint, Defendants deny generally  
4 and specifically, each and every allegation contained in paragraphs 113.

6 114. Answering paragraph 114 of Plaintiff's Complaint, Defendants deny generally  
7 and specifically, each and every allegation contained in paragraphs 114.

9 115. Answering paragraph 115 of Plaintiff's Complaint, Defendants deny generally  
10 and specifically, each and every allegation contained in paragraphs 115.

11 116. Answering paragraph 116 of Plaintiff's Complaint, Defendants deny generally  
12 and specifically, each and every allegation contained in paragraphs 116.

14 117. Answering paragraph 117 of Plaintiff's Complaint, Defendants deny generally  
15 and specifically, each and every allegation contained in paragraphs 117.

17 118. Answering paragraph 118 of Plaintiff's Complaint, Defendants deny generally  
18 and specifically, each and every allegation contained in paragraphs 118.

20  
21 **FIRST AFFIRMATIVE DEFENSE**

22 Plaintiff's complaint fails to state facts sufficient to constitute a cause of  
23 action against Defendant.

25 **SECOND AFFIRMATIVE DEFENSE**

26 Plaintiff's complaint is uncertain.

**THIRD AFFIRMATIVE DEFENSE**

This action is barred by the doctrine of res judicata and/or collateral estoppel.

**FOURTH AFFIRMATIVE DEFENSE**

This action is barred by the statute of limitations.

**FIFTH AFFIRMATIVE DEFENSE**

Plaintiff lacks capacity and/or Article III standing to sue and bring this action.

**SIXTH AFFIRMATIVE DEFENSE**

Plaintiff lacks standing to sue and bring this action because he has suffered no injury in fact.

**SEVENTH AFFIRMATIVE DEFENSE**

Plaintiff lacks standing to seek injunctive relief.

**EIGHTH AFFIRMATIVE DEFENSE**

Plaintiff is not entitled to recovery based on the doctrine of unclean hands.

**NINTH AFFIRMATIVE DEFENSE**

Defendant was not the proximate cause of or has any causal connection to Plaintiff's alleged injury and damage.

**TENTH AFFIRMATIVE DEFENSE**

Plaintiff has failed to mitigate or to reasonably attempt to mitigate his damages, if any.

1                                   **ELEVENTH AFFIRMATIVE DEFENSE**

2           Plaintiff cannot obtain injunctive relief against Defendant because Defendant  
3 is powerless to undertake any injunctive relief.

4                                   **TWELFTH AFFIRMATIVE DEFENSE**

5           Plaintiff's Complaint, and all purported claims for relief alleged in the  
6 Complaint, are barred in whole or in part because Plaintiff's injury or injuries, if  
7 any, was/were caused by third parties acting outside the scope of agency,  
8 employment or control of Defendant.

9                                   **THIRTEENTH AFFIRMATIVE DEFENSE**

10           Plaintiff's claims are barred, in whole or in part, by the doctrines of  
11 estoppel, release, and waiver.

12                                   **FOURTEENTH AFFIRMATIVE DEFENSE**

13           Plaintiff's claims under the TCPA are barred due to an absence of any actual  
14 damages. Hence, any statutory damages are an excessive fine and violate  
15 Defendants' rights under the Due Process and Takings Clause of the United States  
16 Constitution and/or applicable state constitutions.

1 WHEREFORE, Defendants pray that:

- 2 1. Plaintiff take nothing by this action;  
3 2. Defendants be awarded costs, including reasonable attorneys' fees,  
4 of suit; and  
5 3. Defendants be awarded such other relief as this Court may deem  
just and proper.

6 DATED: September 18, 2022

Respectfully submitted,

7 LAW OFFICES OF ELLIOTT N. TIOMKIN  
8

9 /s/ Elliott N. Tiomkin

10 By

11 ELLIOTT N. TIOMKIN, ESQ.

12 Attorneys for Defendants  
13  
14

15 **DEMAND FOR JURY TRIAL**  
16

17 Defendants hereby demand a trial by jury as to all issues of fact properly  
18 triable by jury.  
19

20 DATED: September 18, 2022

Respectfully submitted,

21 LAW OFFICES OF ELLIOTT N. TIOMKIN  
22

23 /s/ Elliott N. Tiomkin

24 By

25 ELLIOTT N. TIOMKIN, ESQ.

26 Attorneys for Defendants  
27  
28